



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101



State of Idaho
Department of Environmental Quality
1410 Brady Hillen
Boise, Idaho 83726

April 14, 2003

Ms. Katie Hain, Manager
Environmental Restoration Program
U.S. Department of Energy
Idaho Operations Office
785 DOE Place
Idaho Falls, Idaho 83402

Re: Long-Term Ecological Monitoring Plan for Operable Unit 10-04 Record of
Decision (ROD).

Dear Ms. Hain:

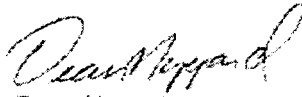
We have significant concerns regarding the Long-Term Ecological Monitoring Plan for Operable Unit 10-04. Although our specific concerns will be submitted separately, we are sending this letter in hope that DOE will reprioritize a substantial portion of the allocated resources for this monitoring effort to more critical FFA/CO needs. We hear over and over how there is no money to collect data to support important agency decisions at OU 3-13, 3-14, 7-10 and 7-13/14. This complaint by DOE has even extended down to the installation of a single \$7K probe. However, here we see an apparent interest in implementing a "No Action" component of the November 2002 ROD well before remedial action for the unacceptable risk components of the ROD has begun, at an estimated cost of \$740K per year.

It was our hope that after two Settlement Agreements, both with penalties, DOE would have finally realized the need to work jointly with its counterparts at IDEQ and EPA, under the authority of the Federal Facility Agreement and Consent Order, to prioritize the limited available funds so as to address the highest risk issues first. In this case, given the extensive annual sampling and analysis planned, it appears that DOE is trying to re-perform the remedial investigation. There is no basis for doing this. As stated in Section 11.2.1 of the OU 10-04 ROD, "A schedule for site walk-downs and visual inspections in the WAG areas will be developed to ensure that assumptions in the risk assessment are still applicable" This should be the first step in ecological monitoring. A second priority in any monitoring is what are the ecologically significant COC's that will result in observable ecological harm. A third consideration should be whether these contaminant levels can be monitored via field portable instrumentation.

We fully support our ROD commitment to annual ecological monitoring, just as we support performing an adequate investigation of the RWMC and characterization of secondary sources of contamination to the aquifer at TRA and INTEC. We need to balance these needs responsibly.

Please contact Wayne at (206) 553-7261, and Dean at (208) 373-0285, if you require clarification or elaboration of our position in this matter.

Sincerely,



Dean Nygard,
Site Remediation
Program Manager



Wayne Pierre
Project Manager